

EXHIBIT A

From: Roderick E. de Ramon [<mailto:rderamon@deramoncrush.com>]
Sent: Monday, June 01, 2015 11:16 AM
To: Savino, William F.; Genova & Malin
Subject: RE: DeRamon

We have repeatedly asked Ratafia to sign off. My brother even called a court conference pro se (state court months ago) and then we got involved and reviewed this matter and Ratafia's lawyer, Steckman was argumentative and resistant to releasing the bond notwithstanding the clear and unambiguous terms of the settlement agreement. Meanwhile my brother continues to pay the bank an additional \$1,000 per month which is completely unnecessary and may threaten his ability to pay your client under the settlement agreement.

As if things aren't quite tough enough, Ron's wife had a massive stroke last Friday and is in critical condition.

My suggestion that someone urge Ratafia to sign off and reimburse my brother for his costs which were completely avoidable had Ratafia complied. This is another example of his bad faith and failure to honor the terms of ANY agreement which is why we are here today.

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From: Savino, William F. [<mailto:WSavino@woodsoviatt.com>]
Sent: Monday, June 01, 2015 8:57 AM
To: Genova & Malin
Cc: Roderick E. de Ramon
Subject: Re: DeRamon

Jack O'Neill will sign right now. Can that get you where you need to go?

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On Jun 1, 2015, at 8:55 AM, Genova & Malin <genmallaw@optonline.net> wrote:

I spoke with Beth who tells me your are no longer working with your firm. Roderick DeRamon has contacted same on several occasions, I believe he has been directed to a Steckman?? Long story short, no one calls back and no one signs the stipulation for the state court to get the bond released. Unfortunately, this has been going on for some time, I was told Ratafia won't sign it, client had no choice but to file this.

Advise.

On 5/30/2015 1:09 PM, Savino, William F. wrote:
Andrea: I hope this finds you well.

I was very surprised by your papers. As you can imagine, Jack O'Neill will sign whatever you need for state court.

I do not show that you tried to reach me. How can we resolve this immediately (because there was never any intent by Jack to slow down close out of the bond)?

My new desk number is 716-248-3210 but I still have the same cell 716-982-2557 and home 716-832-0530. Let's get this genie back in the bottle.

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